

CSD Talking Points

Intro

- Central Sands Dairy (CSD), LLC is located about an hour north of the Wisconsin Dells near Petenwell Lake, a man-made lake on the Wisconsin River.
- The geology in the area contains sandstone aquifers and sandy top soil which increases infiltration. Groundwater flow in this area is toward Petenwell Lake. Petenwell Lake is impaired for Total Phosphorus and experiences extensive blue-green algal blooms.
- In 2012, the owners of Central Sands Dairy submitted an application to build another Concentrated Animal Feeding Operation, Golden Sands Dairy, LLC, approximately 27 miles Northeast of Central Sands Dairy, LLC in Saratoga, Wisconsin.
- Nitrate contamination in private wells has been found for several years.
- EPA has investigated the CSD production area, concentrations of pollutants in private wells, and concentrations of pollutants in the ground water at 41 locations associated with CSD land application areas.

Issues

Private Drinking water well contamination. Note that the Public Water System nitrate MCL of 10 mg/L of nitrate-nitrite can be used as a reference level.

- In September of 2012, a citizen hired Kenneth Wade, P.E., P.G to evaluate CSD's nutrient management plan and CSD's operation. Mr. Wade reported levels of nitrates up to 31 mg/L in private drinking water wells in the area.
- Since at least 2014, the Wisconsin Department of Agriculture (DATCAP) has tested private wells and transmitted the results to citizens in letters stating that "... DHS recommends that all people avoid long-term consumption of water having nitrate concentrations greater than 10 mg/L."
- In October 2017, EPA sampling found 5 private wells of the 15 sampled had results >20 mg/L. The others were under 10. This sampling event was based on land application fields but was not coordinated with specific planned applications.
- On May 3rd, 2018, EPA conducted sampling at private wells downgradient of fields where CSD had planned to apply in spring. All 5 of the samples were >10 mg/l ranging from 21.9 mg/L to 40.4 mg/L.

R5 EPA's Inspection of Central Sands Dairy Production Area and Nutrient Management Plan Review:

Ex. 5 AC/AWP/DP

WDNR's Activities and Authority:

- In 2016, in response to concerns about potential groundwater impacts, WDNR proposed a permit which included production area groundwater wells and upgradient wells.
- CSD installed the production area wells but contested the addition of upgradient wells. WDNR withdrew the proposed permit and entered a stipulated agreement with CSD

agreeing to not require the proposed upgradient monitoring wells and CSD agreed to changing its practice on one field associated with an existing well to evaluate if a change in practice would reduce nitrate levels.

- WDNR has a well compensation program to provide emergency water supplies and well compensation to well owners whose wells are impacted by offsite livestock bacterial or nitrate contamination that are located within an area of Special Eligibility. A special designation could potentially be considered.
- Under Wisconsin's groundwater regulations, WDNR required CSD to sample the groundwater that it uses to irrigate its fields and found high levels of nitrates. WDNR is currently considering how to ensure that CSD accounts for these nitrates to ensure it does not over-apply.

Ex. 5 AC/AWP/DP